

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

DEC 10 2024

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

DOCKET NO. 3:24-cr-255-MOC

v.

BILL OF INDICTMENT

Violations:

18 U.S.C. § 933(a)(1)

18 U.S.C. § 922(o)

18 U.S.C. § 924(c)

MICHAEL NAUN ANTUNEZ VASQUEZ
a.k.a MAICOL ANTUNEZ-VASQUEZ

THE GRAND JURY CHARGES:

COUNT ONE

(Trafficking in Firearms)

From in or about July 18, 2024, through and including August 1, 2024, in Union County, within the Western District of North Carolina, the defendant,

MICHAEL NAUN ANTUNEZ VASQUEZ
a.k.a MAICOL ANTUNEZ-VASQUEZ,

did ship, transport, transfer, cause to be transported, or otherwise dispose of one or more of the following firearms:

1. a Glock model 19 firearm,
2. a Glock, model 19C firearm,
3. a Glock, model 30 firearm, and
4. a Glock, model 48 firearm,

to another person, in or otherwise affecting interstate or foreign commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of one or more of the firearms by the recipient would constitute a felony as defined in Title 18, United States Code, Section 932(a), in violation of Title 18, United States Code, Section 933(a)(1).

COUNT TWO

(Transfer of a Machinegun)

On or about August 1, 2024, in Union County, within the Western District of North Carolina, the defendant,

**MICHAEL NAUN ANTUNEZ VASQUEZ
a.k.a MAICOL ANTUNEZ-VASQUEZ,**

did knowingly transfer a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a Glock, model 19, 9mm handgun, that had been converted into a machinegun capable of fully automatic fire, without manual reloading, by a single function of the trigger; in violation of Title 18, United States Code, Section 922(o).

COUNT THREE

(Possession of a Machinegun)

On or about September 4, 2024, in Union County, within the Western District of North Carolina, the defendant,

**MICHAEL NAUN ANTUNEZ VASQUEZ
a.k.a MAICOL ANTUNEZ-VASQUEZ,**

did knowingly possess a machinegun, as that term is defined in Title 18, United States Code, Section 921(a)(24), to wit: a device intended to convert a semiautomatic rifle into a machinegun capable of fully automatic fire, without manual reloading, by a single function of the trigger; in violation of Title 18, United States Code, Section 922(o).

COUNT FOUR

(Possession of a Firearm in Furtherance of Drug Trafficking)

On or about September 4, 2024, in Union County, within the Western District of North Carolina, the defendant,

**MICHAEL NAUN ANTUNEZ VASQUEZ
a.k.a MAICOL ANTUNEZ-VASQUEZ,**

did knowingly possess one or more firearms in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute a Controlled Substance, a violation of Title 21, United States Code, Section 841(a)(1), in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with § 924(d) because they were involved in, used, or intended to be used in the violation alleged in this bill of indictment. The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

- a) A Glock model 19 firearm,
- b) A Glock, model 19C firearm,
- c) A Glock, model 30 firearm
- d) A Glock, model 48 firearm, and
- e) A Glock, model 31 firearm,
- f) A Baretta, model APX firearm
- g) A Palmetto State Armory, model PA-15 firearm, and
- h) A Romarm/Cugir, Mini Draco model firearm

A TRUE BILL



FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'TIM SIELAFF'.

TIM SIELAFF
ASSISTANT UNITED STATES ATTORNEY